

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WA 2917

25

6/2/1983

FILE COPY

M/S 533

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

JUN 2 1983

Ronald S. West, President
Chemical Processors, Incorporated
5501 Airport Way South
Seattle, Washington 98108

Re: Facility No. WAD000812917

Dear Mr. West:

This is to acknowledge that the Environmental Protection Agency (EPA) has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is EPA's opinion, based on the assumption that the information submitted is complete and accurate, that you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265. You are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

The State of Washington Department of Ecology (DOE) recently adopted State hazardous waste regulations and is working toward receiving authorization to carryout the State program in lieu of EPA requirements. You will be informed when authorization is granted. In the meantime, the DOE and EPA will continue cooperative efforts in carrying out State and Federal requirements.

MAD

Molczak:nay:5-18-83

USEPA RCRA



3012910

WMB

CONCURRENCES

SYMBOL	Hegdahl					
SURNAME						
DATE						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

-2-

Enclosed is a copy of "Conditions of Operation during Interim Status" which identifies the processes your facility may use, their design capacities and the types of waste your facility may accept during interim status. This information was obtained from the Part A permit application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Parts 270.10 and 270.70.

If you have any questions concerning this letter, please call Marianne Olczak at (206) 442-1262.

Sincerely,

Kenneth D. Feigner, Chief
Waste Management Branch

Enclosure

cc: Tom Cook, DOE, Olympia
Jim Malm, DOE
Jim Hinman, Chemical Processors

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

CHEM-SECURITY SYSTEMS, INC.

P.O. Box 1866 • Bellevue, Washington 98009 • (206) 827-0711

June 6, 1983

Complete per 9/1
Heister
Carrie

RECEIVED
JUN 8 - 1983

WASTE MANAGEMENT BRANCH

Mr. Donald W. Moos, Director
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Dear Mr. Moos:

On July 26, 1982 Chem-Security Systems, Inc. (CSSI) submitted to the Department appropriate documents demonstrating that certain financial requirements of WAC 173-303-820 (3)(d) would be satisfied. This was done as a preliminary step for CSSI to purchase the assets of three facilities owned by Chemical Processors, Inc. and would become effective upon execution of the purchase agreement. Recently, however, CSSI announced that it would not move forward with the purchase.

The purpose of this letter therefore, is to provide you with formal notification that the purchase will not occur and to request that you provide me with an appropriate release such that the following instruments may be cancelled:

- 1) Aetna Casualty and Surety Company Financial Guarantee Bonds, Surety Bonds, Surety Bond Numbers 81 SB 024671 BCA, 81 SB 024693 BCA and 81 SB 824682 BCA;
- 2) A trust agreement between CSSI and the Bank of California with regard to the subject Chemical Processors, Inc. facilities; and
- 3) Certificates of Liability Insurance for sudden accidental occurrences.

For our purposes we will also need to receive from you the sealed original documents which we submitted in our July 26, 1982 correspondence.



Mr. Donald W. Moos
June 6, 1983
Page 2

I hope this request adequately satisfies your needs. If not, please do not hesitate to call me at (206) 827-0711. In the meantime, I will look forward to a continuing fine working relationship with you and your staff in the hazardous waste management program. Best regards.

Sincerely,

CHEM-SECURITY SYSTEMS, INC.



Kenneth A. Lepic, Manager
Regulatory Affairs

KAL:slj

cc: Mr. Kenneth D. Feigner
Mr. Roger E. Nelson

CHEM-SECURITY SYSTEMS, INC.

P.O. Box 1866 • Bellevue, Washington 98009 • (206) 827-0711

July 26, 1982

Mr. Donald W. Moos, Director
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Mr. John Spencer
Regional Administrator
U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED

JUL 28 1982

WASTE MANAGEMENT BRANCH

Gentlemen:

In his July 23, 1982 letter, Ronald S. West, President of Chemical Processors, Inc. provided you with notification pursuant to 40 CFR 265.12(b) and WAC 173-303-290(2) of a planned change in ownership of certain of the Chemical Processors facilities. Specifically, on or about September 15, 1982, Chem-Security Systems, Inc. (CSSI) plans to execute the purchase of the business and assets at the following locations:

- 1) Alexander Street Facility, Tacoma, Washington;
- 2) South Lucille Street Facility, Seattle, Washington; and
- 3) Pier 91 Facility, Seattle, Washington.

In accordance with 40 CFR 122.23(c)(4) - Changes During Interim Status and WAC 173-303-820-(3), please find as Enclosures 1 through 3 a revised Part A of the RCRA permit application for each of the three (3) above named facilities. As you will notice, the permit applications identify CSSI as the owner and operator. Now that we are revising the Part A documents, I would also like to bring to your attention certain adjustments to each Part A. The nature and reasons for such adjustments are described in Enclosure 4.

In addition to the Part A revisions, 40 CFR 122.23(c) and WAC 173-303-820(3)(d) require that the new owner provide financial assurance for closure and insurance for sudden accidental occurrences. Therefore, in accordance with the rules governing facility closure and liability insurance requirements published in the April 7, 1982 and April 16, 1982 Federal Register, please find as Enclosure 5 specific information pertaining to each facility.

RECEIVED

JUL 27 1982

AIR & HAZARDOUS MATERIALS DIV.



CSSI

A Subsidiary of Chem-Nuclear Systems, Inc.

Messrs. Moos and Spencer
July 26, 1982
Page 2

As you are aware, the facilities are located in the State of Washington, a state where EPA is administering the requirements of 40 CFR 265. However, the Washington Department of Ecology has established hazardous waste regulations that include requirements for financial assurance of closure and liability coverage.

In our reading of 40 CFR 265.149, we notice that EPA will allow an operator to use state required financial mechanisms if it is found that the state mechanisms are at least equivalent to those specified in 40 CFR 265, Subpart H. In this regard, we request that the State of Washington regulations at WAC 173-303-620 be considered acceptable for meeting applicable EPA requirements. To assist EPA in its consideration, please find as Enclosure 6 a copy of our correspondence to the State of Washington which transmits a Surety Bond, Trust Agreement and a Certificate of Liability Insurance for each of the subject facilities. This information shows that funds for the required closure activity are a certainty and that liability coverage is in place.

For your information, the agreement between the parties for the purchase transaction calls for state and federal agency "recognition" of the new owner before the closing documents can be executed. In this regard we would ask that you provide an appropriate response at your earliest convenience. From our perspective such a response would likely be a recognition of CSSI as the new owner conditioned upon the execution of the purchase.

I thank you in advance for your prompt consideration of this request. If you, or your staff, have any questions, please feel free to contact me at 827-0711.

Sincerely,

CHEM-SECURITY SYSTEMS, INC.



Kenneth A. Lepic, Manager
Regulatory Affairs

KAL:slj

Enclosures

cc: Mr. Tom J. McCord, CSSI
Mr. Ronald S. West, Chemical Processors, Inc.

ENCLOSURE 4

Changes to Part A

Alexander Avenue Facility

Section III.C: The original submission showing "T01 652,4000" contained an extra "0" which was a typographical error. In addition, S02 was included in Section IV as an applicable process code but was inadvertently omitted from Section III. In order to properly describe the facility as it existed at the time Part A was originally submitted and as it exists today, the 652,400 gallon figure should represent tank storage (S02) while tank treatment (T01) should be 24,000 gallons per day.

South Lucille Street Facility

Section III.C: The facility has certain treatment processes which were inadvertently omitted from the Part A. These include cyanide destruction, chemical neutralization and solvent settling. In order for the Part A to properly reflect such operations which have long been routine processes, the Part A is adjusted to include T01 at 10,000 gallons per day.

Pier 91 Facility

Section III.C: The facility stores large quantities of materials much of which are not classified as hazardous wastes. In addition to storage, the facility always used oil/water separation, phenol oxidation, precipitation of heavy metals, pH adjustment and chromium reduction as a routine operation. This occurs in the storage tanks. For some unknown reason, the Part A inadvertently omitted the listing of tank treatment (T01) at 40,000 gallons per day. The Part A now includes such activities.

ENCLOSURE 5

Facilities For Which Financial Mechanisms
Have Been Established

EPA I.D. #: WAD-020 257 945
Name: Chem-Security Systems, Inc.
Address: 1701 Alexander Avenue
Tacoma, Washington 98421
Closure Funds: \$ 93,400.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate

EPA I.D. #: WAD-000 812 909
Name: Chem-Security Systems, Inc.
Address: 734 South Lucille Street
Seattle, Washington 98101
Closure Funds: \$ 11,660.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate

EPA I.D. #: WAD-000 812 017
Name: Chem-Security Systems, Inc.
Address: Pier 91
Seattle, Washington 98119
Closure Funds: \$ 26,202.00
Liability Coverage: \$1,000,000.00 each occurrence
\$2,000,000.00 annual aggregate

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE
TELEPHONE CALLS, INCOMING OR OUTGOING,
AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM:

Cathy Craig

TITLE:

LOCATION &
PHONE NO.:

DATE: 7-19-82

TIME: 3:00pm

CALL TO:

Ken Dupic

TITLE:

Chem Security Systems

LOCATION &
PHONE NO.:

(206) 827-9727

SUMMARY OF CALL:

We discussed three of the permit application (Chemical Processors) Pier 91, Lucille St, and Alexander Ave. We did not talk about Chempco Portland because he did not have that permit yet. Many of the mistakes were duplicated on each of the app. He was in a great hurry and did not want to go over each one. I expect there will be some mistakes on the new permit A's. He is going to call me back when he gets Chempco - Portland

Cathy B. Craig
(Signature)

Pin 91 - Chen Proc.

U 197 - pg 78534 11/25/80.

"D" wastes - quantity is needed.

Unit of measurement is incorrect on pg 3 of 5

TO1 is not on page 1 of 5 but is on page 3 of 5

Municipal sewer + Market Product

are not needed.

~~closed~~.

K049, K050, K051 were re-evaluated Nov. 12, 1980.

file Part A
WAD 00081 2917

★★ Seattle Post-Intelligencer, Thursday, May 20, 1982 A3

haunted Chemical tortors testify blast—then trip on I-5

By Solveig Torvik
P-I Reporter

A barrel containing waste paint solvents from Lockheed Shipyards exploded in Edmonds early yesterday afternoon "with a loud roar and a big boom."

The flatbed truck carrying the waste cargo was parked a block from the 300-pupil Westgate School. Some of the children heard the boom and smelled something like fresh paint, said their principal, John Samples.

Driver Gordon Brougher, who was knocked down by the impact of the "deafening" explosion, saw a "reddish cloud" go over his head. He took a quick look at the other 75 drums aboard, some of which contained cyanide, freon and electroplating wastes.

He said three other drums were bulging.

He drove the truck from his house in the 9700 block of 220th Southwest Street, where it was parked, and down Interstate 5 to Pier 91, where his chemical waste transportation company, Resource Recovery and Chemical Processors Inc., is located.

Brougher said that he called his dispatcher on the truck's two-way radio to notify him of the problem, after he called God.

"I'll be 43 in June and I want to live to see it," he said.

But no one called the state patrol to alert it to the explosive cargo heading down the freeway, according to company officials.

And the Seattle Fire Department wasn't notified of the potential trouble until after the truck arrived at Pier 91.

Seattle Deputy Fire Chief R.B. Bower, head of the hazardous materials team, said, "Perhaps it would have been better to notify the Edmonds Fire Department" than to drive the truck, in danger of another explosion, through freeway traffic to Pier 91.

Bower said that at the time the driver made the decision to take the truck on the freeway to Seattle, Brougher did not know whether there was going to be another explosion. "We could have had other drums blow up" on the freeway, Bower said.

But Brougher, who has been driving hazardous wastes for six years, and his superiors defended his "judgment call" to take the truck on the freeway.

The fire department's hazardous materials team quickly sealed off the area and evacuated some two dozen persons within a 300-yard radius of the truck. Then, at first unsure of what chemicals were aboard and what might happen next, they hosed down the drums with water in hopes of cooling them down. A crew from Resource Recovery climbed aboard the truck and pried loose the seals to check the pressure in all the drums.

No interaction

There were no more explosions and no injuries in the incident. The damaged drums were repacked in larger containers.

John Kimberly, president of Resource Recovery, said there never was any danger that the whole load of chemicals would blow up in a chain reaction because they would not interact that way. The cyanide was in solid form, he added.

And he said that the driver made

Man killed



Chemical Process to Seattle
Pier 91
this remains with you

INTERNAL CHECKLIST

☐ ACKNOWLEDGEMENT SENT
☒ Approved for Phase I
Acknowledgement

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING

☐

(2) FORM 3 MISSING

☐

B. POSTMARK after NOVEMBER 19, 1980

☐

Valid

☐

C. (1) DATE of OPERATION MISSING

☐

(2) DATE of OPERATION after NOVEMBER 19, 1980

☐

D. (1) NOTIFIED after AUGUST 18, 1980

☐

Valid

☐

2 Non Notifier

☐

VALID

☐

E. (1) FORM 1, XIII B SIGNATURE MISSING

☐

(2) FORM 3, IX B SIGNATURE MISSING

☐

2. A. TSD

☒

B. NONREGULATED

☐

C. UNSURE

☐

D. UNKNOWN FACILITY

☐

(missing name and address on Form 3)

☐

☐

☐

☐

☒



United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

III Design capacity shows SO₂, Description
of wastes shows SO₂, D80, TDI

IV
+ comments "Municipal sewer" "market
product"

OWNER: _____
FACILITY: Chemical Processors, Inc. (Pier 91)
LOCATION: Seattle, Wn. REVIEWER: Day DATE: 4/21/81

BASED ON PART A APPLICATION, EPA WILL REQUEST PART B APPLICATION FOR:

<u>TREATMENT</u>	<u>STORAGE</u>	DISPOSAL
PRIORITY CLASSIFICATION:	1	<u>2</u> <u>3</u> 4 5
comments: Wash. DEC (?)		based on volume,

A&HM PRIORITY RANKING 70 comments:

IS WASTE CURRENTLY REGULATED? YES NO

IS WASTE LISTED AS "ACUTELY HAZARDOUS"? YES NO

identify: P110

IS WASTE STORED LONGER THAN 90 DAYS? (?) YES NO

IS THIS AN EXISTING LAND DISPOSAL FACILITY? YES NO

DOES FACILITY QUALIFY AS SMALL QUANTITY GENERATOR? YES NO

IS THIS A ^{NEW} RECYCLING FACILITY? YES NO (existing)

STATUS-- INTERIM? YES NO

IF NO, IS FACILITY NEW? YES NO

LATE FILER? YES NO

Comments:

1. Treatment process shown on p. 3, but not on p. 1.
2. U197 (Quinones) Delisted?
F017 & F018 Delisted?